

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC; LAURA
RICCIARDI; AND MOIRA DEMOS,**

Defendants.

Civil No.: 19-CV-484

DECLARATION OF KEVIN L. VICK

I, Kevin L. Vick, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

1. I am one of the attorneys for Defendants Laura Ricciardi, Moira Demos and Chrome Media LLC (collectively the “Producer Defendants”) in the above-captioned action. I have personal knowledge of the matters set forth in this declaration, unless otherwise stated. I make this declaration in support of the Producer Defendants’ Reply in support of Motion for Summary Judgment.

2. Attached as Exhibit 1 is a true and correct copy of my discovery correspondence to Plaintiff’s counsel Christina Sommers dated August 10, 2022. This letter is referenced in the August 23, 2022 and August 26, 2022 letters that Plaintiff filed with his Opposition at Dkts. 317-2 and 317-3 and provides remaining context on the Producer Defendants’ document production and discovery responses.

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 9, 2022

Respectfully submitted,

/s/ Kevin L. Vick
Kevin L. Vick